

TENNESSEE AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-1531



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued:

Permit Number:

457148

Date Expires: November 1, 2013

Issued To:

ITW CIP Fasteners, a Division of  
Illinois Tool Works Inc.

Installation Address:

850 Steam Plant Road  
Gallatin

Installation Description:

03: Metal Parts Manufacturing Facility.  
Processing and Dip Spin Coating Metal Fasteners.

Emission Source Reference No.

83-0159

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

CONDITIONS:

1. The application that was utilized in the preparation of this permit is dated February 25, 2004 and signed by David Jose, General Manager for the permitted facility. If this person terminates his/her employment or is reassigned different duties such that he/she is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The permittee would be considered a major source because their "potential to emit" value for a single hazardous air pollutant (HAP) was greater than 10 tons per year, and for a combination of hazardous air pollutants (HAPs) was greater than 25 tons per year at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for HAPs.
3. Any non compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability thresholds of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within fifteen (15) working days of such discovery. This notification, at a minimum, shall include the identification of the source(s), identification of the permit condition(s) violated and details of the non-compliance.
4. The permittee is placed on notice that **Condition 9** of this operating permit contains limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9- .02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.

Compliance with **Condition 9** assures that the source will be below the major source applicability thresholds for a single hazardous air pollutant (HAP) of 10 tons per year, and for a combination of hazardous air pollutants (HAPs) of 25 tons per year.

5. The permittee shall submit a written report by March 31 of every year starting in 2005. In this report, the permittee shall state the compliance status of this facility with **Condition 9** of this permit. This report shall cover the preceding calendar year and shall include the records required by **Condition 14**. The permittee shall mail this report to the following address:

Tennessee Division of Air Pollution Control  
Nashville Environmental Assistance Center  
711 R. S. Gass Blvd.  
Nashville, TN 37243

6. On January 2, 2004, the U. S. Environmental Protection Agency issued the final rule for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63 Subpart Mmmm). This facility may be subject to this regulation if it becomes a major source for hazardous air pollutants. If this facility becomes subject this regulation, the permittee shall comply with the notification procedures in 40 CFR §63.3910 and the compliance date in 40 CFR §63.3883.
7. Should proof of compliance for the pollutant(s) with emission limitations placed on this permit be required, the emissions measuring test method(s) and procedure(s) are the following:

Pollutant or Parameter	Testing Methodology
Volatile Organic Compound Content	EPA Method 24 as published in the current 40 CFR 60, Appendix A
Hazardous Air Pollutant Content	EPA Method 311 as published in the current 40 CFR 63, Appendix A

8. Volatile organic compounds (VOC) emitted from this source shall not exceed 40.0 tons during all intervals of twelve (12) consecutive months. This emission limitation is established pursuant to Rule 1200-3-7-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated June 17, 1996.

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9. The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per year. Total emissions of all HAPs from the entire facility shall not exceed 24.9 tons per year. In the event that the emission rates from the entire facility exceed these limits, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.
10. The coatings used at this source shall not exceed the following VOC limit on an as applied basis pursuant to TAPCR 1200-3-18-.20(3) (a):

Coating Category	VOC Content kilograms VOC per liter (kg/L)	VOC Content pounds VOC per gallon (lb/gal)
High performance architectural coating	0.75	6.2
Heavy-duty truck touch-up	0.58	4.8
Clear coating	0.52	4.2
Steel pail and drum interior	0.52	4.3
Air-dried coating	0.42	3.5
Extreme performance coating	0.42	3.5
All other coatings	0.36	3.0

Note: VOC content values are expressed in units of mass of VOC per volume of coating, excluding water and/or exempt compounds, as applied.

11. As an alternative to compliance with **Condition 10**, the daily weighted average VOC content shall not exceed the VOC limits for each coating category listed in **Condition 10** in accordance with TAPCR 1200-3-18-.20(4). Compliance with this condition shall be demonstrated by the record keeping required in the following table or a table that contains the same information. The permittee shall keep a separate table for each of the seven different coating categories listed in **Condition 10**.

Daily Weighted Average VOC Content Table				
Coating Category: _____				
Date: _____				
i	Materials, Coatings, and Thinners Only; not Clean-up Solvents	Usage (gallons) {V <sub>i</sub> }	VOC Content (pounds VOC per gallon) {C <sub>i</sub> }	Pounds VOC {V <sub>i</sub> C <sub>i</sub> }
1				
2				
3				
etc.				
		Total Usage = V <sub>T</sub> = ΣV <sub>i</sub>		Total Pounds VOC = ΣV <sub>i</sub> C <sub>i</sub>
i = 1, 2, 3, etc. = the number of coatings (of the same coating category) used during one day				
Daily Weighted Average VOC Content, VOC <sub>DW</sub> = [(ΣV <sub>i</sub> C <sub>i</sub> ) / (V <sub>T</sub> )]				

12. Visible emissions from this source shall not exceed twenty (20) percent opacity except for one six minute period per one (1) hour or more than twenty-four (24) minutes in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (6 minute average). TAPCR 1200-3-5-.03(6) and TAPCR 1200-3-5-.01(1)

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13. The as-supplied VOC content of all VOC-containing materials to be used by this source shall be determined as follows:

All Coatings, Inks, Adhesives, Thinners, and Solvents - from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning 180 days from the issue date of this permit. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)
Material #1		
Material #2		
etc.		

14. The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and during each 12 month period. The permittee shall maintain records of these emissions in a form that readily shows compliance with **Conditions 8 and 9** of this permit (See example below). Calculations of monthly VOC and HAP emissions and the associated calculations of the twelve consecutive month VOC and HAP emissions must be completed within sixty (60) days of the end of each month. These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be retained for a period of not less than five (5) years.

#### MONTHLY VOC/HAP EMISSIONS LOG

MONTH:

Material Name	Usage (gallons per month (gpm))	VOC Content (pounds VOC per gallon)	VOC Emissions (tons VOC per month)	HAP <sub>i</sub> Content (pounds HAP <sub>i</sub> per gallon)	HAP <sub>i</sub> Emissions (tons HAP <sub>i</sub> per month)	HAP <sub>p</sub> Content (pounds HAP <sub>p</sub> per gallon)	HAP <sub>p</sub> Emissions (tons HAP <sub>p</sub> per month)	Total HAP Emissions (tons HAP <sub>i</sub> thru HAP <sub>p</sub> per month)
Material <sub>1</sub>								
Material <sub>2</sub>								
Material <sub>i</sub>								
TOTAL								

Note:  $i = 1, 2, 3, \dots, n$  = the number of different materials, and  $p = 1, 2, 3, \dots, n$  = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

#### YEARLY VOC/HAP EMISSIONS LOG

Month, Year	VOC Emissions (tons VOC per month)	(*)VOC Emissions (tons VOC per 12 months)	HAP <sub>i</sub> Emissions (tons HAP <sub>i</sub> per month)	(*)HAP <sub>i</sub> Emissions (tons HAP <sub>i</sub> per 12 months)	HAP <sub>p</sub> Emissions (tons HAP <sub>p</sub> per month)	(*)HAP <sub>p</sub> Emissions (tons HAP <sub>p</sub> per 12 months)	Total HAP Emissions (tons HAP <sub>i</sub> through HAP <sub>p</sub> per month)	(*)Total HAP Emissions (tons HAP <sub>i</sub> through HAP <sub>p</sub> per 12 months)
January, Year								
February, Year								
etc.								

(\*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

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15. The issuance of this permit supersedes any permit(s) previously issued for this facility.
16. The permittee shall apply for renewal of this permit not less than 60 days prior to the permit's expiration date pursuant to Division Rule 1200-3-9-.02(3).

(end of conditions)

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